

# **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
  
KELLY WILSON, )  
Plaintiff, )  
vs. ) Case No.  
THE WALT DISNEY COMPANY, ) 3:14-cv-01441-VC  
DISNEY ENTERPRISES, INC., )  
WALT DISNEY PICTURES, and )  
WALT DISNEY MOTION PICTURES )  
GROUP, INC., )  
Defendants. )  
\_\_\_\_\_)

DEPOSITION OF PETER DEL VECHO  
Burbank, California  
Tuesday, October 28, 2014  
Volume I  
  
Reported by:  
ROCHELLE HOLMES  
CSR No. 9482  
Job No. 1956786  
  
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Deposition of PETER DEL VECHO, taken on behalf of  
Plaintiff, at 2100 Riverside Drive, Suite 301, Burbank,  
California, beginning at 9:33 a.m. and ending at 4:02  
p.m. on Tuesday, October 28, 2014, before ROCHELLE  
HOLMES, Certified Shorthand Reporter No. 9482.

1 Q Okay. What are the documents that you reviewed  
2 to prepare yourself for your deposition?

3 A I read through some of the notes from meetings  
4 that were taken just to re-familiarize myself with those  
5 notes. I glanced at the storyboards that you have there  
6 in front of you. And to my recollection, that's all I  
7 looked at.

8 Q When you say "storyboards", that's this pile of  
9 documents here that we will get to a little bit later.

10 A Yes.

11 Q When you say you glanced at them, were you  
12 actually looking at these same sheets of paper that I  
13 have?

14 A Yes.

15 Q All right. Other than your meeting with your  
16 counsel yesterday, is there anything else that you did  
17 specifically to prepare yourself for your deposition?

18 A Yes.

19 Q And what is that?

20 A I looked at our short again. I also looked at  
21 the short of the plaintiff's; is that the right term?

22 Q Yes, sir.

23 So that would be The Snowman short?

24 A Yes.

25 Q All right. Anything else that you did?

1 A No.

2 Q When you say you looked at your short, are you  
3 referring to the Frozen teaser trailer?

4 A Yes.

5 Q And when is it that you looked at that to  
6 prepare yourself for your deposition?

7 A Yesterday.

8 Q Is yesterday also when you looked at The  
9 Snowman short as well?

10 A Yes.

11 Q How did you go about looking at The Snowman  
12 short? And by that, I mean did you pull it up on  
13 YouTube or where did you have that?

14 A I looked it up on YouTube, yes.

15 Q Was that the first time you had looked at The  
16 Snowman short?

17 A I believe once John McGuire told me there was  
18 an issue -- this was well after the movie had come  
19 out --

20 Q Stop right there. Don't tell me what  
21 Mr. McGuire said.

22 A Okay.

23 Q So the question is: Is that the first time you  
24 had looked at this --

25 A I had seen it once before, months ago.

1 terms of, you know, what is available and the  
2 storytelling and all that, which is kind of more by the  
3 directors or myself?

4 Q What do you mean by that, "practical  
5 constraints"?

6 A The teasers generally -- particularly on this  
7 movie, are done very, very early on in the process so we  
8 don't have a lot of assets built. Like if you look at  
9 the movie, we have all the assets done, finished, and it  
10 looks beautiful. At this stage, not all of the assets  
11 were built, so we might be more limited in what the art  
12 director can kind of choose from.

13 Q I see. So at what stage in the production of  
14 the movie were you starting to work on the trailer?

15 A You mean the teaser?

16 Q Right. The teaser trailer.

17 A We were still figuring out the story of the  
18 movie itself. Even though it came out in later that  
19 same year, 2013, we were still making big changes to the  
20 story.

21 Q Okay.

22 A Just because I think it's somewhat relevant to  
23 your question, our movie was actually supposed to come  
24 out this November, 2014. And six months into the  
25 project, they asked us to come out a year earlier.

1 Q Nice.

2 A So when you talk about putting a teaser  
3 together, we didn't have a lot of the things you would  
4 normally have, and so we had to move quickly and  
5 expeditiously and so forth, so I don't know if that is  
6 relevant or not, but it's the truth.

7 Q Truth is always good and it may be relevant.

8 So ordinarily -- if I'm understanding what you  
9 are saying, ordinarily, when you are putting together a  
10 trailer or teaser trailer for a movie, the movie is far  
11 more developed or much more closer to being,  
12 quote/unquote, in the can than was the case with respect  
13 to this particular movie, Frozen; is that a fair  
14 assessment?

15 MR. KLAUS: Object to the form. It's outside the  
16 scope.

17 You can answer the question.

18 THE WITNESS: I would phrase it a little  
19 differently --

20 Q BY MR. GIGNAC: Please.

21 A -- in that on a more normal schedule, we would  
22 have been further along with the building of elements  
23 and the story so that in putting a trailer or teaser  
24 together, there may be sections of the movie that were  
25 already completed that we could choose from without a

1 Do you see that up at the top there?

2 A I do.

3 Q What is the meaning of that, "official  
4 turnover", is that some type of indication that the  
5 teaser trailer has been completed and is being handed  
6 off or turned over?

7 A Well, these are out of order, April 18th versus  
8 the 17th.

9 Q Yes. April 18th is at the top of the page.

10 A Well, Brent Hall is in post production, so we  
11 are getting close; but he is suggesting on the 18th in  
12 response to Heather that we wait. And essentially when  
13 we are done with post production, we hand it over across  
14 the street and now they can take it for distribution.  
15 So the fact that he is suggesting we hold off a little  
16 bit, it means we are very close.

17 Q Very close to the end?

18 A Yes.

19 Q Okay.

20 A But again, there is other things that happened  
21 like Christophe Beck writing the score, a lot of that  
22 gets folded in after that. So we may be done with the  
23 visuals for it, but there is still additional post  
24 production work that needs to happen post that.

25 Q All right. Certainly wouldn't be after this



1           A     Somewhere, I believe it was 2012, we were  
2 brought up to Pixar for a group meeting with all the  
3 international marketing teams. And one of the things we  
4 heard -- and all the producers of the current shows were  
5 there as well as the directors. And one of the things  
6 we heard from our international team was that a lot of  
7 trailers -- whether they are trailers or teasers, don't  
8 work in their countries because they are dependent on  
9 jokes that don't translate well. And they cried loudly  
10 for wouldn't it be great if we could have teasers that  
11 were physical comedy where it wasn't dependent on the  
12 word play, but would just read universally and was  
13 comedic because everyone loves to laugh.

14                 So I can't remember exactly when that meeting  
15 happened, but that was in 2012. When we came back to  
16 the studio, I talked with the directors and we agreed,  
17 you know, this is going to be really important at some  
18 point to take that information and we have got the  
19 perfect characters already in our movie to do that, to  
20 come up with. So the idea of doing it was around for a  
21 while, but we had other production worries and we  
22 weren't ready to do a teaser at that point. And at some  
23 point they said, hey, there is an opportunity to do it.  
24 If you can get something good enough and get something  
25 ready, there is an opportunity to put it on the head of

1 Q Okay. I appreciate that.

2 A Just -- I'm reading my own e-mail.

3 Q Sure.

4 A "It would be good to have five or so drawings  
5 per idea so we have some visuals to go along with the  
6 verbal pitch." So that to me means I'm telling Paul,  
7 hey, for these ideas that we have been talking about,  
8 make sure we have at least a few drawings per idea. So  
9 I don't know whether some of them were created  
10 beforehand or some of them as a result of that comment.

11 Q Okay. Let's move over to Page 8.

12 MR. KLAUS: Are you going to start with a new  
13 document?

14 MR. GIGNAC: Do you want to take a breather?

15 MR. KLAUS: Can we take a break real quick?

16 MR. GIGNAC: Absolutely.

17 (A brief recess was taken.)

18 Q BY MR. GIGNAC: So on Page 8 of Exhibit 6,  
19 these are the quote/unquote meeting notes. I'm looking  
20 at the entry for January 15, 2013, which says, "Teaser  
21 ideas, pitch to JL Notes."

22 Do you see that, sir?

23 A I do.

24 Q Do you recall this as the first opportunity or  
25 first time that the concept for the teaser trailer was

1 pitched to Mr. Lasseter?

2 A Yes.

3 Q Okay. Did you have any conversations prior to  
4 this pitch meeting with Mr. Lasseter at which you  
5 discussed with him at all what the general ideas were  
6 for the teaser trailer?

7 MR. KLAUS: Object to the form.

8 You can answer.

9 THE WITNESS: Not the ideas. I'm sure that in our  
10 meetings I would say, hey, we are working on some ideas  
11 and we are going to share them with you in a month or so  
12 or whatever the conversation was, but not the specifics  
13 of the ideas.

14 Q BY MR. GIGNAC: Okay. So as far as you know,  
15 he would have been coming into this meeting relatively  
16 cold in terms of what the ideas were for the teaser  
17 trailer?

18 A Correct.

19 Q Okay. And the references here in the left  
20 margin, at least the first two JLs, do those refer to  
21 Mr. Lasseter as opposed to Jenn Lee?

22 A Yes. I believe in the context of this meeting,  
23 JL refers to John Lasseter and JLEE refers to Jenn Lee.

24 Q All right. The second reference to JL, it  
25 says, "We have a new IP," and then it says, "pantomime